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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

Genesis Global Holdco, LLC, *et al.*,

Debtors.¹

Chapter 11

Case No. 23-10063 (SHL)

Jointly Administered

Re: Docket No. 329

**RESERVATION OF RIGHTS OF THE AD HOC GROUP WITH RESPECT TO
NOTICE OF FILING OF DEBTORS' MOTION FOR ENTRY OF ORDER EXTENDING
THE DEBTORS' EXCLUSIVE PERIODS IN WHICH TO FILE A CHAPTER 11 PLAN
AND SOLICIT ACCEPTANCES THEREOF AND GRANTING RELATED RELIEF**

The ad hoc group of lenders (the "Ad Hoc Group") respectfully files this reservation of right (this "Reservation of Rights") regarding the *Debtors' Motion for Entry of an Order Extending the Debtors' Exclusive Periods in Which to File a Chapter 11 Plan and Solicit Acceptances*

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number (as applicable) are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (9564); and Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

Thereof and Granting Related Relief [Docket No. 329] (the “Motion”).² In support of this Reservation of Rights, the Ad Hoc Group of Genesis Lenders respectfully submits as follows:

RESERVATION OF RIGHTS

1. On May 19, 2023, the Debtors filed the Motion, pursuant to section 1121(d) of the Bankruptcy Code, whereby the Debtors requested an extension of the Debtors’ exclusive periods to file and solicit a chapter 11 plan for 100 days. Motion ¶ 3. Since the filing of the Motion, the Ad Hoc Group has met and conferred with the Debtors and various other parties in interest with respect to the path forward in these chapter 11 cases and to discuss the confines of a potential chapter 11 plan. Such discussions remain ongoing, but the Ad Hoc Group is optimistic that a consensual form of amended chapter 11 plan will be reached and filed in the upcoming weeks.

2. In light of the foregoing, the Ad Hoc Group understands that the Debtors have agreed to modify their requested extension pursuant to the Motion, reducing such request to 75 days—extending the Exclusive Filing Period through August 2, 2023 and the Exclusive Solicitation Period through October 1, 2023. Subject to the modified request, the Ad Hoc Group does not object to the Motion.

3. The Ad Hoc Group files this Reservation of Rights to clarify that, despite its support for the relief requested in the Motion, as modified and described herein, the Ad Hoc Group fully and completely reserves its rights to (i) object to any further requests for any additional extensions of the Exclusive Filing Period or the Exclusive Solicitation Period, and (ii) move to terminate the Debtors’ Exclusive Filing Period and Exclusive Solicitation Period for cause at any time, including

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

prior to the modified extended Exclusive Filing Period and Exclusive Solicitation Period deadlines requested in the Motion.

Dated: June 2, 2023

PROSKAUER ROSE LLP

/s/ Brian S. Rosen

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